

**Comments and Recommendations on the National Organic Standards Board
Aquatic Animal Task Force Recommendations**

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Good afternoon. My name is Deborah Brister. I am an organic inspector and member of the Independent Organic Inspector's Association. I am also the sustainable aquaculture project manager at ISEES, the Institute for Social, Economic and Ecological Sustainability at the University of Minnesota. I am speaking today on behalf of ISEES Director and Professor of Fisheries and Conservation Biology, Anne Kapuscinski, and myself.

We would like to comment on the recommendations put forth by the NOSB's Aquatic Animal Task Force. We at ISEES would like to commend you on a fine job overall. These recommendations are a significant improvement from the draft standards proposed two years ago. It is clear that all the hard work put in at workshops and working groups over the last year or so is paying off.

While we are impressed with the progress made, we do not agree with the Task Force recommendations that disallow farmers of molluscs an opportunity to market their product as organic. The Task Force's rationale is inconsistent with terrestrial organic standards in three specific areas: feed, health and differentiation between organic and conventionally reared animals. We would like to address each of these individually.

First, the Task Force has acknowledged that molluscan feeding is a natural process and benefits the environment by cycling excess nutrients. They have also acknowledged that production areas with specific environmental qualities are selected. Unfortunately, the Task force has failed to recognize that these areas are selected for not only water quality conditions such as temperature and salinity, but also for the most suitable feed available for farmed molluscan animals.

The location of these operations is a specific management decision and these decisions should be considered comparable to that of the organic livestock farmer designating organic pastureland for grazing livestock. That designated pastureland is what the organic livestock will feed upon, not a specific feed ration (such as 10 pounds of grass, 5 pounds of leaves and 1 pound of dandelions). The terrestrial livestock feed ration includes forage growing in the delineated area the farmer has selected and to which the animal has access. This is identical to algal and microorganismal feeds growing in the delineated area of a mollusc culture operation. It is the manager's decision to permit the molluscan animals to graze upon or filter-feed the foods in this selected area.

In addition to managing access to feed consumed during grow-out periods, molluscan farmers pro-actively provide specific feed rations in more enclosed rearing units to juveniles at pre-growout stages and especially to broodstock during conditioning in preparation for spawning. For example, they select combinations of algae that provide specific polyunsaturated fatty acids that are essential in gonad and egg development. If the mollusc culture operations are land-based throughout the production cycle, the farmer must provide specific types and amounts of feed rations for each stage of the molluscan animals. Mollusc aquaculturists clearly make many feed management decisions.

Secondly, the Aquatic Animal Task Force has also stated in their recommendations that “there appears to be little to no proactive health care management.” The reality is that health care management is extremely proactive, both through the site selection of the operation in order to provide optimal environmental conditions (e.g., adequate tidal flushing to replenish dissolved oxygen and remove wastes) and through decisions about the density of animals per unit volume of grow-out waters and placement of animals in the water column. A major goal for terrestrial livestock producers is to minimize the amount of administered medication by providing a healthy environment. Molluscan aquaculturists strive for this as well. When the environment is substandard relative to the animal’s needs, the animal’s health is compromised, thereby increasing the animal’s susceptibility to disease and infection. The mollusc farmer, therefore, proactively selects his sites and animal stocking density and placement in the water column with that very consideration in mind.

Substandard water quality will adversely affect aquatic animals often resulting in death because of their inherent high level of environmental sensitivity. Predators, parasites, bacterial and viral infections can impair the health of molluscs and it is up to the manager to make proactive decisions to protect his or her aquatic livestock. In the event that medications not on the National List are necessary, these animals, just like organic terrestrial livestock, would then be sold as conventionally grown molluscs.

Finally, the Task Force suggests that differentiation between organic and non-organic mollusc farming operations is insignificant. Again, this is incorrect. One of the most important distinctions between terrestrial organic and non-organic operations is the restriction on applications of toxic chemicals, including many pesticides and herbicides, that may be harmful to the environment. For example, in southwestern Washington State, mollusc operators may apply synthetic chemicals such as Carbaryl to their grow-out areas to combat pest species of burrowing shrimp. Unfortunately, applications of this chemical can kill other non-target invertebrate species and so, in all likelihood the chemical would never be approved for use in organic operations. The disallowance of toxic chemicals in organic production is a significant and very important distinction between organic and non-organically produced molluscs.

We at ISEES believe that it is imperative that organic standards for aquatic animals be as consistent with terrestrial livestock standards as possible. We recommend careful re-examination of the exclusion of organic mollusc production as stated in the Task Force recommendations; keeping in mind that organic standards for aquatic animals should be no more or no less restrictive than standards for terrestrial organic production.

Thank you.